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IN THE

Supreme Court of the United States

OCTOBER TERM, 1953

NO. 15

NATIONAL LABOR RELATIONS BOARD
Petitioner

vs.

LOCAL UNION NO. 1229, INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS

On Writ of Certiorari to the United States Court of Appeals for the District of Columbia

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MOTION OF EMPLOYER FOR LEAVE TO FILE MEMORANDUM STATEMENT, AS AMICUS CURIAE

WHITEFORD S. BLAKENEY
Charlotte, North Carolina
Attorney for the Petitioner

Of Counsel:
F. T. MILLER, JR.
Charlotte, North Carolina

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To the Honorable, The Chief Justice and the Associate Justices of the Supreme Court of the United States:

The Jefferson Standard Broadcasting Company respectfully presents to the Court:

1. That it is a North Carolina corporation having its principal office and place of business in Charlotte, North Carolina.

2. That Petitioner is the employer involved in this controversy.

3. That Petitioner has a direct, substantial and urgent interest in this case.

4. That it is upon this Petitioner that the burden of any decision supporting the complaint herein will fall; that the directives which have been sought and are being sought in this case would operate solely and specifically against this Petitioner; that more particularly, the directives being sought are that this Petitioner shall be required to take a number of discharged employees back into its employment and that this Petitioner shall be required to pay to them large sums of money and that this Petitioner shall be required to recognize and deal with the Union named above; that there is no person or party which has a more direct and urgent and obvious interest in this case than does this Petitioner.

5. That the Petitioner heretofore asked leave to intervene in and become a party to this proceeding but this request the Court denied.

6. That originally this was a proceeding brought and prosecuted solely against this Petitioner, and defended solely by this Petitioner, but that in the recent and present stages of the case, where its merits will be authori-

tatively determined, the Petitioner has been completely excluded as a party and denied any voice in the case—despite the fact that the directives sought would be, as pointed out above, wholly and solely against this Petitioner and the burden thereof would fall wholly and solely upon this Petitioner.

7. That this Petitioner now asks the Court for leave to file a Memorandum Statement herein, as amicus curiae —such Memorandum Statement to be short, consisting of approximately six printed pages, and not to constitute any further or additional argument of the case but to consist entirely of a statement of what this Petitioner considers to be the significant facts of the case as they appear of record.

WHEREFORE, the Petitioner respectfully prays the Court for leave to file such a Memorandum Statement, as amicus curiae.

WHITEFORD S. BLAKENEY
Charlotte, North Carolina
Attorney for the Petitioner

Of Counsel:

F. T. MILLER, JR.
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